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February 27, 2015

**Via Electronic Submission**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
12<sup>th</sup> Street Lobby – TW-A325  
Washington, D.C. 20554

**Re: AT&T Annual CPNI Compliance Certifications Calendar Year 2014  
EB Docket No. 06-36**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.2009(e), AT&T, on behalf of the attached list of operating entities, hereby submits its annual CPNI compliance certifications for calendar year 2014 via the Commission's Electronic Comment Filing System.

Should you have any questions, feel free to contact me.

Sincerely,

**/s/ Celia Nogales**  
Celia Nogales

Attachment A – List of AT&T Operating Entities

Attachment B – Summary of Customer Complaints & Actions Taken Against Data Brokers

**AT&T Inc. CPNI Certification**  
**Calendar Year 2014**

Date: 24 February 2015

1. I, Anne H. Chow, SVP Global Solutions & Sales Operations, hereby certify on behalf of AT&T Business Solutions ("Responsible Business Unit") based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.
2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2014, the Responsible Business Unit for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. §64.2001 et. seq. (the "FCC's CPNI rules").
3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: 

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2014  
OF Anne H. Chow, SVP Global Solutions and Sales Operations, AT&T Business  
Solutions**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by AT&T Business Solutions ("My Organization") ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in My Organization, or (ii) developed by other organizations, in which case My Organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence.

**A. Customer CPNI Approvals.** To the extent applicable, My Organization has:

1. Established and distributed methods and procedures (M&Ps) whereby personnel were instructed not to disclose or permit access to customer's CPNI for "out of category" services without customer approval or unless such disclosure or access was permitted under FCC rules. Personnel were apprised that any approval or disapproval by a customer of the use, disclosure or access to the customer's CPNI must remain in effect

until revocation or limitation of such approval or disapproval. See 47 C.F.R. §64.2005(a) and (b), and 47 C.F.R. §64.2007(a)(2).

2. Established and distributed M&Ps whereby personnel were required to make a record of a customer's consent to the use of CPNI information. Such records are maintained for at least one year. See 47 C.F.R. §64.2007(a)(3).

3. Established and distributed M&Ps whereby personnel were prohibited from the use, disclosure or access to a customer's individually identifiable CPNI, except where: (1) the customer granted "opt in approval" as defined in 47 C.F.R. §64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. §64.2005; (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. §64.2007(b).

4. Established and distributed M&Ps whereby personnel were required, prior to any solicitation for customer approval to use, disclose, or permit access to the customer's CPNI, to notify the customer of the customer's right to restrict use, disclosure and access to CPNI. See 47 C.F.R. §64.2008(a)(1). Also, established and distributed M&Ps whereby personnel were required to make a record of customer's consent to the use of CPNI information in compliance with 47 C.F.R. §64.2007(a)(3) and 47 C.F.R. §64.2008(a)(1).

5. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for customer approval, to notify the customer on an individual basis of the customer's right to restrict the use of, disclosure of, and access to that customer's CPNI. 47 C.F.R. §64.2008(b).

6. Maintained an email method and toll free number with voice mail whereby customers, at no additional cost, could avail themselves of an "opt-out" method. The email method and voice mail were available 24 hours a day, seven days a week. See 47 C.F.R. §64.2008(d)(3).

7. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for limited, one time use of a customer's CPNI for duration of the call, to provide the customer with the required notifications as set forth in 47 C.F.R. §64.2008(f).

8. Established M&Ps or implemented systems to clearly establish the status of a customer's CPNI approval prior to the use of CPNI. See 47 C.F.R. §64.2009(a).



9. Has supervisory review processes in place to reasonably ensure compliance with its personnel obtaining supervisory approval of any proposed outbound marketing request for customer approval, and for the maintenance of records related to carrier compliance. See 47 C.F.R. §64.2009 (c) and (d).

**B. Training and Discipline:** My Organization:

1. Requires all personnel who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, My Organization periodically provides such personnel information on CPNI and other privacy related issues through less formal education methods such as employee communications, refresher training, and meetings. Further, vendors have contractual obligations to follow CPNI regulations and to conduct themselves in an ethical manner and all AT&T employees are required to review the Code of Business Conduct, that contains CPNI information, on an annual basis. See 47 C.F.R. §64.2009(b).
2. AT&T maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment. Similarly, any failure by vendor employees to comply with CPNI rules subjects them to removal from AT&T's program. See 47 C.F.R. §64.2009(b).

**C. CPNI Complaints and Breaches:** To the extent applicable, My Organization has apprised relevant personnel that: (a) they are required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI through a tracking system; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009(e).

**D. Security and Authentication.** To the extent applicable, My Organization has:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access. See C.F.R. §64.2010(a).

2. Established M&Ps prohibiting the disclosure of call detail over the phone unless the customer provides a password established in a manner consistent with 47 C.F.R. §64.2010(b).
3. Established procedures for online access to CPNI in a manner consistent with 47 C.F.R. §64.2010(e).
4. Established procedures that notify customers immediately when there has been a change to the account as contemplated by 47 C.F.R. §64.2010(f).

**AT&T Inc. CPNI Certification**  
**Calendar Year 2014**

February 25, 2015

1. I, Jerrie Kertz, Senior Vice President- Operations Planning & Optimization, hereby certify on behalf of AT&T Technology & Operations ("Responsible Business Unit") based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.
2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2014, the Responsible Business Unit for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. §64.2001 et. seq. (the "FCC's CPNI rules").
3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

A handwritten signature in black ink, appearing to read "Jerrie Kertz", is positioned below the third item of the certification. The signature is written in a cursive, flowing style.

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2014**  
**OF Jerrie Kertz, Senior Vice President, Operations Planning & Optimization, AT&T**  
**Technology & Operations**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by AT&T Technology & Operations (“My Organization”) ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC’s rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in My Organization, or (ii) developed by other organizations, in which case My Organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence.

**A. Customer CPNI Approvals.** To the extent applicable, My Organization has:

1. Established and distributed methods and procedures (M&Ps) whereby personnel were instructed not to disclose or permit access to customer’s CPNI for “out of category” services without customer approval or unless such disclosure or access was permitted under FCC rules. Personnel were apprised that any approval or disapproval by a customer of the use, disclosure or access to the customer’s CPNI must remain in effect until revocation or limitation of such approval or disapproval. See 47 C.F.R. §64.2005(a) and (b), and 47 C.F.R. §64.2007(a)(2).
2. Established and distributed M&Ps whereby personnel were required to make a record of a customer’s consent to the use of CPNI information. Such records are maintained for at least one year. See 47 C.F.R. §64.2007(a)(3).
3. Established and distributed M&Ps whereby personnel were prohibited from the use, disclosure or access to a customer’s individually identifiable CPNI, except where: (1) the



customer granted “opt in approval” as defined in 47 C.F.R. §64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. §64.2005; (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. §64.2007(b).

4. Established and distributed M&Ps whereby personnel were required, prior to any solicitation for customer approval to use, disclose, or permit access to the customer’s CPNI, to notify the customer of the customer’s right to restrict use, disclosure and access to CPNI. See 47 C.F.R. §64.2008(a)(1). Also, established and distributed M&Ps whereby personnel were required to make a record of customer’s consent to the use of CPNI information in compliance with 47 C.F.R. §64.2007(a)(3) and 47 C.F.R. §64.2008(a)(1).

5. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for customer approval, to notify the customer on an individual basis of the customer’s right to restrict the use of, disclosure of, and access to that customer’s CPNI. 47 C.F.R. §64.2008(b).

6. Maintained an IVR, toll free number and or web address whereby customers, at no additional cost, could avail themselves of an “opt-out” method. The IVR and voice mail were available 24 hours a day, seven days a week. See 47 C.F.R. §64.2008(d)(3)(v).

7. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for limited, one time use of a customer’s CPNI for duration of the call, to provide the customer with the required notifications as set forth in 47 C.F.R. §64.2008(f).

8. Established M&Ps or implemented systems to clearly establish the status of a customer’s CPNI approval prior to the use of CPNI. See 47 C.F.R. §64.2009(a).

**B. Training and Discipline: My Organization:**

1. Requires all personnel who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, My Organization periodically provides such personnel information on CPNI and other privacy related issues through less formal education methods such as employee communications, refresher training, and meetings. Further, vendors have contractual obligations to follow CPNI regulations and to conduct themselves in an ethical manner and all AT&T employees are required to review the Code of Business Conduct, that contains CPNI information, on an annual basis. See 47 C.F.R. §64.2009(b).

2. AT&T maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including

termination of employment. Similarly, any failure by vendor employees to comply with CPNI rules subjects them to removal from AT&T's program. See 47 C.F.R. §64.2009(b).

**C. CPNI Complaints and Breaches:** To the extent applicable, My Organization has apprised relevant personnel that: (a) they are required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI through a tracking system; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009(e).

**D. Security and Authentication.** To the extent applicable, My Organization has:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access. See C.F.R. §64.2010(a).
2. Established M&Ps prohibiting the disclosure of call detail over the phone unless the customer provides a password established in a manner consistent with 47 C.F.R. §64.2010(b).
3. Established procedures for online access to CPNI in a manner consistent with 47 C.F.R. §64.2010(c)<sup>1</sup> and 47 C.F.R. §64.2010(e).
4. Established procedures that notify customers immediately when there has been a change to the account as contemplated by 47 C.F.R. §64.2010(f)

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<sup>1</sup>In the fall of 2014, AT&T discovered an issue where AT&T Mobility customers transferred billing responsibility for a mobile number from one account to another, or separated a mobile number from a multi-line account to a standalone account (which is also referred to here as a "transfer" of that mobile number). If the transferred number was used as the log-in ID for the pre-transfer online account, it was possible to use that log-in ID and the associated password to access the online account for the transferred number after the transfer was completed. AT&T has changed its processes so that transfers of billing responsibility and account separations occurring after December 26, 2014 are not affected, and is in the process of addressing prior transfers and account separations.

**AT&T Inc. CPNI Certification**  
**Calendar Year 2014**

Date: 2/16/15

1. I, Mark Collins, Senior Vice President - AT&T Mobility LLC, ("Responsible Business Unit") hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2014, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: 

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2014  
OF MARK COLLINS, SENIOR VICE PRESIDENT, AT&T MOBILITY LLC**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the AT&T Mobility LLC business unit which includes Mobility Marketing, Customer Service, Retail Sales, Sales and Service Operations, Cricket, Digital Life and Internet of Things Solutions ("My Organization" or hereinafter referred to as "AT&T") ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in My Organization, or (ii) developed by other organizations, in which case My Organization operates in compliance with such applicable processes and procedures. In addition, AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence.

**A. Customer CPNI Approvals.** To the extent applicable My Organization has:

1. Established and distributed methods and procedures (M&Ps) whereby AT&T employees, agents and representatives were instructed not to disclose or permit access to customer's CPNI for "out of category" services without customer approval or unless such disclosure or access was permitted under FCC rules. See 47 C.F.R. §64.2005(a) and (b) and §64.2008(e).
2. Established and distributed M&Ps whereby AT&T employees, agents and representatives were prohibited from the use, disclosure or access to a customer's individually identifiable CPNI, except where: (1) the customer granted "opt in approval"



as defined in 47 C.F.R. §64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. §64.2005; and (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. §64.2007(b).

3. Established and distributed M&Ps whereby AT&T employees, agents, and representatives were required, prior to any solicitation for customer approval to use, disclose, or permit access to the customer's CPNI, to notify the customer of the customer's right to restrict use, disclosure and access to CPNI. See 47 C.F.R. §64.2008(a)(1). Also, distributed M&Ps whereby AT&T employees, agents and representatives were required to make a record of a customer's consent to the use of CPNI information in compliance with 47 C.F.R. §64.2007(a)(3) and 47 C.F.R. §64.2008(a)(1).

4. Established and distributed M&Ps or scripts whereby AT&T employees, agents and representatives were required, prior to any oral solicitation for customer approval, to notify the customer on an individual basis of the customer's right to restrict the use of, disclosure of, and access to that customer's CPNI. 47 C.F.R. §64.2008(b) and (c).

5. Established and distributed M&Ps or scripts whereby AT&T employees, agents and representatives were required, prior to any oral solicitation for limited, one time use of a customer's CPNI for duration of the call or duration of visit, to provide the customer with the required notifications as set forth in 47 C.F.R. §64.2008(f).<sup>1</sup>

6. Established M&Ps or implemented systems to clearly establish the status of a customer's CPNI approval prior to the use of CPNI. See 47 C.F.R. § 64.2009(a).

**B. Training and Discipline:** To the extent applicable, My Organization:

1. Requires all personnel who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, My Organization periodically provides such personnel information on CPNI and other privacy related issues through less formal education methods such as employee

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<sup>1</sup> In January 2015, it was discovered that revised order process instructions for in-store sales representatives implemented by a retail agent of AT&T in late September 2014 inadvertently omitted the duration-of-visit CPNI notification language that AT&T required the retail agent to use, and that was previously used, for in-store marketing of out-of-category services, such as roadside assistance. This defect was immediately remedied.



communications, refresher training, and meetings. Further, vendors have contractual obligations to follow CPNI regulations and to conduct themselves in an ethical manner. In addition to specific training, all AT&T employees are required to review the Code of Business Conduct which includes general information regarding the protection of customer records and system access policies on an annual basis. See 47 C.F.R. §64.2009 (b).

2. Follows AT&T's policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment. Similarly, any failure by vendor employees to comply with CPNI rules subjects them to removal from AT&T's program. See 47 C.F.R. §64.2009 (b).

**C. CPNI Complaints and Breaches:** To the extent applicable My Organization has apprised relevant personnel that: (a) they are required to make a record through a tracking system of any customer complaint regarding unauthorized access to, disclosure or release of CPNI; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (b).

**D. Security and Authentication.** To the extent applicable My Organization has:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access. See C.F.R. § 64.2010(a).
2. Established M&Ps prohibiting the disclosure of call detail over the phone unless the customer provides a password established in a manner consistent with 47 C.F.R. § 64.2010(b).
3. Established procedures for online access to CPNI in a manner consistent with 47 C.F.R. § 64.2010 (c).
4. Established procedures for back-up authentication methods for lost and forgotten passwords consistent with C.F.R. § 64.2010(e).
5. Established procedures that notify customers immediately when there has been a change to the account as contemplated by 47 C.F.R. §64.2010 (f).

**AT&T Inc. CPNI Certification  
Calendar Year 2014**

Date: 2-24-15

1. I, Mel Coker, Chief Marketing Officer – Home Solutions AT&T Services, Inc., hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2014, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: Mel Coker

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2014  
OF MEL COKER, CHIEF MARKETING OFFICER – HOME SOLUTIONS FOR AT&T  
SERVICES, INC.**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by Home Solutions (my organization) ensures compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence.

**A. Customer CPNI Approvals.** To the extent applicable my organization has:

1. Established and distributed methods and procedures (M&Ps) whereby personnel were not to disclose or permit access to customer's CPNI for "out of category" services without customer approval or unless such disclosure or access was permitted under FCC rules and personnel were apprised that any approval or disapproval by a customer of the use, disclosure or access to the customer's CPNI must remain in effect until revocation or limitation of such approval or disapproval. See 47 C.F.R. §64.2005(a) and (b), and 47 C.F.R. §64.2007(a)(2).
2. Established and distributed M&Ps whereby personnel were required to make a record of a customer's consent to the use of CPNI information. Such records are maintained for at least one year. See 47 C.F.R. §64.2007(a)(3).
3. Established and distributed M&Ps whereby personnel were prohibited from the use, disclosure or access to a customer's individually identifiable CPNI, except where: (1) the

customer granted “opt in approval” as defined in 47 C.F.R. §64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. §64.2005; (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. §64.2007(b).

4. Established and distributed M&Ps whereby personnel were required, prior to any solicitation for customer approval to use, disclose, or permit access to the customer’s CPNI, to notify the customer of the customer’s right to restrict use, disclosure and access to CPNI. See 47 C.F.R. §64.2008(a)(1). Also, established and distributed M&Ps whereby personnel were required to make a record of customer’s consent to the use of CPNI information in compliance with 47 C.F.R. §64.2007(a)(3) and 47 C.F.R. §64.2008(a)(1).

5. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for customer approval, to notify the customer on an individual basis of the customer’s right to restrict the use of, disclosure of, and access to that customer’s CPNI. 47 C.F.R. §64.2008(b) and (c).

6. Maintained an IVR and toll free number with voice mail whereby customers, at no additional cost, could avail themselves of an “opt-out” method. The IVR and voice mail were available 24 hours a day, seven days a week. See 47 C.F.R. §64.2008(d)(3)(v).

7. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for limited, one time use of a customer’s CPNI for duration of the call, to provide the customer with the required notifications as set forth in 47 C.F.R. §64.2008(f).

8. Established M&Ps or implemented systems to clearly establish the status of a customer’s CPNI approval prior to the use of CPNI. See 47 C.F.R. §64.2009(a).

9. Established supervisory review processes to reasonably ensure compliance with its personnel obtaining supervisory approval of any proposed outbound marketing request for customer approval, and for the maintenance of records related to carrier compliance. See 47 C.F.R. § 64.2009 (d) and (c).

**B. Training and Discipline:** My organization:

1. Requires all personnel who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, my organization periodically provides such personnel information on CPNI and other privacy related issues through less formal education methods such as employee communications, refresher training, and meetings. Further, vendors have contractual obligations to follow CPNI regulations and to conduct themselves in an ethical manner and all AT&T employees are required to review the

Code of Business Conduct, that contains CPNI information, on an annual basis. See 47 C.F.R. §64.2009 (b).

2. AT&T maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the severity of the non-compliance. Similarly, any failure by vendor employees to comply with CPNI rules subjects them to removal from AT&T's program depending on the severity of the non-compliance. See 47 C.F.R. §64.2009 (b).

**C. CPNI Complaints and Breaches:** To the extent applicable my organization has apprised relevant personnel that: (a) they are required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI through a tracking system; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (e).

**D. Security and Authentication.** To the extent applicable my organization has:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access. See C.F.R. § 64.2010(a).
2. Established methods and procedures prohibiting the disclosure of call detail over the phone unless the customer provides a password established in a manner consistent with 47 C.F.R. § 64.2010(e)
3. Established procedures for online access to CPNI in a manner consistent with 47 C.F.R. § 64.2010 (c) and (e).
4. Established procedures that notify customers immediately when there has been a change to the account as contemplated by 47 C.F.R. §64.2010 (f).



**AT&T Inc. CPNI Certification**  
**Calendar Year 2014**

Date: 2/11/15

1. I, Paul W. Stephens, Senior Vice President & Controller, AT&T Services, Inc. hereby certify, on behalf of Finance ("Responsible Business Unit"), based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2014, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: 

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2014  
OF PAUL W. STEPHENS, SENIOR VICE PRESIDENT & CONTROLLER, AT&T SERVICES INC., FINANCE**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the Asset Protection, Credit & Collections, and Global Fraud Management organizations within AT&T Finance ("My Organization") ensure compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in My Organization, or (ii) developed by other organizations, in which case My Organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence.

**A. Customer CPNI Approvals**

1. The Credit and Collections organization has established methods and procedures to ensure compliance with the rules around approval for the use, disclosure or access to CPNI and required notification to customers to the extent personnel in the organization make sales referrals on inbound calls and for which the sales transaction is completed by other work groups. (See 47 C.F.R. §64.2005(a) and (b), and 47 C.F.R. §64.2007(a) (2)).

2. To the extent Credit and Collections and Global Fraud Management personnel market to customers on inbound calls, adequate training for the associated methods and procedures have been provided to such personnel to ensure an understanding of when they are and are not authorized to use CPNI as status of a customer's CPNI approval prior to use of CPNI for marketing purposes. (See 47 C.F.R. §64.2009(a) and (b)).

## **B. Training and Discipline**

1. AT&T has established policies that explain the requirements for protecting CPNI. Employees in Asset Protection, Credit and Collections, and Global Fraud Management are required to adhere to the policies as well as the AT&T Code of Business Conduct. The Code of Business Conduct describes employees' obligation to protect customer information. Additionally, there is companywide training intended to help employees protect against social engineering that may lead to unauthorized release of CPNI. There are also departmental standards and practices for ensuring compliance up to and including disciplinary actions against employees who do not adhere to CPNI rules. (See 47 C.F.R. §64.2009(b)).

## **C. CPNI Complaints and Breaches**

Asset Protection personnel investigate CPNI security breach allegations. Asset Protection also has the responsibility for reporting all CPNI security breaches to law enforcement and customers as required.

1. AT&T Services, Inc. established methods and procedures to manage reporting CPNI security breaches to the Federal Bureau of Investigation (FBI) and United States Secret Service (USSS). These methods and procedures are periodically reviewed by Asset Protection personnel to ensure compliance. (See 47 C.F.R. §64.2011(a), and (b)).

2. AT&T Services, Inc. established methods and procedures for notifying customers of a CPNI security breach; and the information is provided to Corporate Operations Privacy (COP) representative, who is responsible for directing the distribution of the CPNI breach notification letters to customers. These methods and procedures are reviewed with Asset Protection personnel periodically to ensure compliance. (See 47 C.F.R. §64.2011(c))

3. AT&T Services, Inc. developed methods and procedures to ensure Asset Protection personnel maintain records of CPNI breaches including, if available, dates of discovery and notification, a detailed description of the CPNI that was the breach subject, and the breach circumstances. These records are retained for a minimum of two (2) years. (See 47 C.F.R. §64.2011(d)).

4. Methods and procedures are in place to support the requirements for tracking customer complaints regarding the unauthorized release of CPNI information. The methods are reviewed semi-annually for completeness and communications are sent to all employees to increase awareness. (See 47 C.F.R. §64.2009(e), 64.2011).

#### **D. Security and Authentication**

1. For personnel in Credit and Collections and Global Fraud Management with access to CPNI, methods and procedures are in place to ensure adequate safeguards for the disclosure of CPNI. Procedures include specific authentication requirements prior to disclosing CPNI, including the use of passwords and back up authentication methods for lost or forgotten passwords as applicable. Additionally, procedures are in place to provide the required notifications for account changes as required by the rules. (§64.2010(a), (b), (c), (e) and (f)).

**AT&T Inc. CPNI Certification**  
**Calendar Year 2014**

Date: 2/12/15

1. I, Tom Moore, Senior Vice President HR Compensation, Benefits and Policy, hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2014, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature:  Moore



**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2014  
OF Tom Moore, SVP HR-Compensation, Benefits & Policy**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the Human Resources Policy organization ("My Organization") comply with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to comply with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in My Organization, or (ii) developed by other organizations, in which case My Organization operates in compliance with such applicable processes and procedures. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence.

1. My Organization accesses and uses CPNI only for the purpose of administering the discounted rate programs extended by the Company to AT&T employees and retirees.
2. My Organization requires employees who have access to personally identifiable information in employee records, including CPNI, to follow Company policy regarding the appropriate treatment of such information. Employees in My Organization with access to CPNI are required to take appropriate training addressing the protection of employee and customer data, including compliance training on privacy principles, which includes information about CPNI, and an annual review of the Code of Business Conduct, which also contains information about CPNI. My Organization also emphasizes privacy requirements through less formal education methods such as employee communications and meetings. Any failure by employees to comply with CPNI rules is subject to disciplinary action up to and including termination of employment. Further, vendors have specific contractual obligations to follow CPNI regulations. See 47 C.F.R. §64.2009 (b).

3. To the extent applicable My Organization has apprised relevant personnel that: (a) they are required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI through a tracking system; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (e).

**AT&T Entities**

Providing telecommunications (wireless or wireline) and /or Interconnected VOIP services

<b>Name of FCC-Regulated Business</b>	<b>FCC Registration Number</b>
Acadiana Cellular General Partnership	0001837814
Alascom, Inc.	0001572676
Allied Wireless Communications LLC (OH)	0019981380
AT&T Communication s Of In iana, GP	0012838421
AT&T Communications Of New York, Inc.	0012838462
AT&T Communications Of Texas, LLC	0016657918
AT&T Communications Of Virginia, LLC	0012838546
AT&T Corp.	0005937974
AT&T Management Services, L.P.	0002534451
AT&T Mobility LLC	0004979233
AT&T Mobility II LLC (holding)	0016982233
AT&T Mobility Of Galveston LLC	0016658122
AT&T Mobility Puerto Rico Inc.	0003473709
AT&T Mobility Spectrum LLC	0014980726
AT&T Mobility USVI inc.	0004499034
AT&T Mobility Wireless Operations Holdings Inc.	0020078887
AT&T Of Puerto Rico, Inc.	0001731462
AT&T Of The Virgin Islands, Inc.	0003464344
AT&T Services, Inc.	0008644056
Bellsouth Long Distance, Inc.	0003733318
Bellsouth Telecommunications, LLC	0020882668
Bristol Bay Cel lular Partnership	0001568898
Centennial Communi cations Corp.	0009631136
Chattanooga MSA Limited Partnership	0001842723
Cingular Wireless Of Texas RSA # 11 Limited Partnership	0003294048
Cingular Wireless Of Texas RSA # 16 Limited Pai1nership	0003294006
Cricket Communication Inc	0010202521
Cricket License Company LLC	0020583332
Cricket Wireless LLC	0022720445
Elkhart Cellular Telephone Company	0012927109
Florida RSA No. 28 (Indian River) Limited Partnership	0001837566
Houma-Thibodaux Cellular Partnership	0004547931
Illinois Bell Telephone Company	0002860856

**AT&T Entities**

Providing telecommunications (wireless or wireline) and /or Interconnected VOIP services

<b>Name of FCC-Regulated Business</b>	<b>FCC Registration Number</b>
Indiana Bell Telephone Company, Incorporated	0002904654
Lafayette MSA Limited Partnership	0001682509
Lake Mobility LLC	0022683619
Leap License Co Inc	0022879878
Leap Wireless International inc	0002963528
Louisiana RSA No. 7 Cellular General Partnership	0001837798
Louisiana RSA No. 8 Limited Partnership	0001837830
Lubbock SMSA Limited Partnership	0001650787
Madison SMSA Limited Partnership	0002842060
McAllen-Edinburg-Mission SMSA Limited Partnership	0001658467
Michigan Bell Telephone Company	0002776771
Milwaukee SMSA Limited Partnership	0002846293
Missouri RSA 11/12 Limited Partnership	0001658418
Missouri RSA 8 Limited Partnership	0001658442
Missouri RSA 9B I Limited Partnership	0001658426
NE- I Acquisition Company LLC	0017686395
Nevada Bell Telephone Company	0001552173
New Cingular Wireless PCS, LLC	0003291192
Northeastern Georgia RSA Limited Partnership	0001837152
Ohio RSA 2 Limited Partnership	0002837094
Ohio RSA 5 Limited Partnership	0002837110
Ohio RSA 6 Limited Partnership	0002837136
Oklahoma City SMSA Limited Partnership	0001658392
Oklahoma Independent RSA 7 Partnership	0010698884
Oklahoma RSA 3 Limited Partnership	0001658376
Oklahoma RSA 9 Limited Partnership	0001658368
Orlando SMSA Limited Partnership	0001843036
Pacific Bell Telephone Company	0001551530
Santa Barbara Cellular Systems, Ltd.	0004312898
SBC Long Distance, LLC	0003763497
SBC Telecom Inc (holding co)	0015024565
SNET America , Inc.	0003737707
SNET Diversified Group, Inc.	0007586423

**AT&T Entities**

Providing telecommunications (wireless or wireline) and /or Interconnected VOIP services

<b>Name of FCC-Regulated Business</b>	<b>FCC Registration Number</b>
Southwestern Bell Telephone Company	0016627473
TC Systems, Inc.	001283351
TCG South Florida	0014533079
Teleport Communications America , LLC	0022315121
Teleport Communications Atlanta , Inc.	0014533178
Teleport Communications New York	0014533301
Texas RSA 18 Limited Pa1tnership	0001666072
Texas RSA 19 Limited Partnership	0001666056
Texas RSA 20B 1 Limited Partnership	0001665058
Texas RSA 6 Limited Pa11nership	0001665991
Texas RSA 7BI Limited Partnership	0001666007
Texas RSA 9BI Limited Partnership	0001666023
Texas RSA No. 2 Limited Partnership	0004550547
The Ohio Bell Telephone Company	0002946986
The Southern New England Telephone Company	0003576931
Tide Mobility LLC	0022415855
Topeka SMSA Limited Partnership	0001658632
Wireless Maritime Services, LLC	0009850488
Wisconsin Bell,Inc	0002716561



**ATTACHMENT B**  
**AT&T CY2014 Annual CPNI Certifications**

**Summary of Customer Complaints and  
Actions Taken Against Data Brokers**

**Summary of Customer Complaints**

As required by 47 C.F.R. §64.2009(e), the following is a summary of customer complaints concerning the unauthorized release of Customer Proprietary Network Information (CPNI) received by AT&T Inc. from January 1, 2014 to December 31, 2014:

<b>CPNI COMPLAINT CATEGORY</b>	<b>Number of Customer Complaints 2014</b>
Accessed online by an unauthorized third party (i.e. not by an AT&T employee/agent)	194
Disclosed to an unauthorized third party (i.e. not to an AT&T employee/agent)	74
Unauthorized access or disclosure by an AT&T employee or AT&T agent	551
<b>Grand Total</b>	<b>819</b>

**Summary of Actions Taken Against Data Brokers**

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.